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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In Re:

DENNIS MEYER DANZIK,
xxx-xx-1786

Debtor.

GEM HOLDCO LLC., a Delaware limited
liability company, GEM VENTURES, LTD., a
Delaware corporation

Plaintiffs,

v.

DENNIS MEYER DANZIK,

Defendant.

Case No. 17-20934
Chapter 11

**ADVERSARY PROCEEDING
No.: 18-02008**

**JOINT STIPULATED MOTION TO VACATE
AND CONTINUE TRIAL AND RELATED DEADLINES**

Plaintiffs GEM Holdco, LLC and GEM Ventures, Ltd. (collectively "GEM"), and Defendant, Dennis Meyer Danzik, each by and through its undersigned counsel of record, respectfully move the Court to vacate and continue the currently scheduled trial date and all related deadlines in this matter. In support of their motion the parties state as follows:

1. Pursuant to the Court's July 23, 2018, *Scheduling Order* [Doc. 15], this matter is set for a two days trial beginning on February 19, 2019, at 9:30 a.m.

2. In addition, the *Scheduling Order* establishes numerous deadlines for pre-trial activities, and requires the parties to prepare and participate in pre-trial activities in anticipation of trial.

3. In the underlying Chapter 11 bankruptcy case of Dennis Meyer Danzik, Case No. 17-20934, there is a pending *Motion to Dismiss*, which motion has been fully briefed and for which an evidentiary hearing has been held.

4. The Court's decision on the *Motion to Dismiss* remains under advisement.

5. If the Court ultimately grants the *Motion to Dismiss*, the instant adversary proceeding will be rendered a nullity.

6. The parties do not wish to engage in time consuming and expensive pre-trial activities, and trial, when it is quite possible that such efforts will be wasted if the Court grants the *Motion to Dismiss*.

7. The parties therefore request that the Court vacate and continue the trial currently scheduled in this matter, and all other future deadlines, and reschedule them for at least forty-five days beyond their current dates, or provide that they will be scheduled once, and if, the Court denies the pending *Motion to Dismiss*.

WHEREFORE, Plaintiffs GEM Holdco, LLC and GEM Ventures, Ltd., and Defendant Dennis Meyer Danzik respectfully move the Court for an order vacating all deadlines in this matter, including the trial which is currently set for February 19th and 20th of 2019, and that said dates and deadlines either be reset for dates and deadlines at least forty-five days beyond their current

settings, or that they be reset set once, and if, the Court denies the pending *Motion to Dismiss* in Mr. Danzik's underlying Chapter 11 bankruptcy case.

RESPECTFULLY SUBMITTED this 27th day of December 2018.

GEM HOLDCO, LLC, AND GEM VENTURES, LTD.

By: /s/ Jeffrey M. Boldt
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DENNIS MEYER DANZIK

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Stipulated Motion to Vacate and Continue Trial and Related Deadlines was served on December 27, 2018, via the ECM/ECF system on the following:

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/s/ Jeffrey M. Boldt
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